

MAR 10 1992

Ms. Christina H. Purcell  
Case Manager  
Bureau of Federal Case Management  
New Jersey Department of Environmental Protection and Energy  
401 East State Street, CN 028  
Trenton, NJ 08625-0028

Re: L. E. Carpenter & Company Site, Wharton, NJ  
Revised Risk Assessment Report Dated January 1992

Dear Ms. Purcell:

As you know, I recently participated in a conference call with Bill Lowry of NJDEPE and Mark Maddaloni, an EPA risk assessor. After this telephone conversation, I was satisfied that NJDEPE was in agreement with EPA's concerns about the revised Risk Assessment Report, except for the following comment:

In Tables 2-1 through 2-6 of the report, Upper 95% Confidence Limit values for the concentrations of various substances in various media are tabulated. However, the Upper 95% Confidence Limit is not defined anywhere in the report. I believe that the definition of this term is important and should be explained, if not in the report, then in a supplemental submittal from Roy F. Weston, Inc. EPA guidance (see page 6-19 of Risk Assessment Guidance for Superfund, Volume I, December 1989, EPA/540/1-89/002) suggests that the Upper 95% Confidence Limit for the arithmetic mean be utilized in risk assessments. However, an Upper 95% Confidence Limit for a randomly chosen data point or for the geometric mean can also be calculated. From eyeballing the Upper 95% Confidence Limit values presented in the report, I suspect that these values were not calculated for the arithmetic mean. While the EPA guidance is not binding and needn't be followed, I believe that there is an obligation to find out what Weston did. This is not a purely academic point since different approaches to defining this Upper Confidence Limit would lead to more or less conservative risk estimates.

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Please consider the above comment in the preparation of NJDEPE's comments on the Revised Risk Assessment Report. Feel free to contact me at (212)264-8098 if you wish to discuss the L. E. Carpenter & Company Site.

Sincerely yours,

Jonathan Josephs, Project Manager  
New Jersey Superfund Branch II  
Emergency and Remedial Response Division

bcc: M. Maddaloni, PSB